

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

ELIZABETH GOMES, EVA M. CONNORS,  
JENNIFER BOWEN, KATISHA  
SHOULDERS, KENNETH N. MARENGA,  
PAMELA PRISCO CARPENTER, STEVEN  
PETERS, ZHANNA KARP, Individually, and  
on Behalf of All Others Similarly Situated,

Plaintiffs,

v.

STATE STREET CORPORATION, STATE  
STREET BANK & TRUST COMPANY,  
NORTH AMERICA REGIONAL  
BENEFITS COMMITTEE OF STATE  
STREET CORPORATION, INVESTMENT  
COMMITTEE OF STATE STREET  
CORPORATION, and JANE and JOHN  
DOES 1-20,

Defendants.

Civil Action No. 1:21-cv-10863-MLW

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

PLEASE TAKE NOTICE that on August 8, 2024, at 2:00 p.m., in Courtroom 2 of the United States District Court for the District of Massachusetts in Boston, Massachusetts, Plaintiffs Elizabeth Gomes, Eva M. Connors, Jennifer Bowen, Katisha Shoulders, Kenneth N. Marenga, Pamela Prisco Carpenter, Steven Peters, and Zhanna Karp (collectively, "Plaintiffs") will and hereby do move this Court for an Order granting final approval of the parties' Class Action Settlement Agreement (ECF No. 86-1).

This motion is made pursuant to Federal Rule of Civil Procedure 23(e) and Section 3.2.5 of the Parties' Class Action Settlement Agreement and is based on the accompanying

Memorandum of Law and authorities cited therein, the Declarations and exhibits attached thereto, the previously filed declarations of the Class Representatives (ECF Nos. 87-94), the Settlement Agreement, and all files, records, and proceedings in this matter. A proposed Final Approval Order is being submitted in connection with this motion as **Exhibit C** to the Declaration of Garrett W. Wotkyns in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement.

This motion is made pursuant to Federal Rule of Civil Procedure 23(h) and Sections 3.2.5, 11.1, and 11.2 of the Parties' Class Action Settlement Agreement (ECF No. 86-1) and is based on the accompanying Memorandum of Law and authorities cited therein, the Declarations of Jeffrey Mitchell and Garrett Wotkyns, all previously filed declarations, including those of the Class Representatives (ECF Nos. 87-94), the Settlement Agreement, and all files, records, and proceedings in this matter.

Defendants do not oppose the motion as parties to the Settlement.

Dated: June 27, 2024

Respectfully submitted,

**SCOTT+SCOTT ATTORNEYS AT LAW LLP**

/s/ Garrett W. Wotkyns

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*Attorneys for Plaintiffs*

**LOCAL RULE 7.1(A)(2) CERTIFICATE**

I hereby certify that on June 27, 2024, counsel for Plaintiffs conferred with Counsel for Defendants, who do not oppose this Motion for Final Approval of Class Action Settlement.

/s/ Garrett W. Wotkins  
Garrett W. Wotkins, *admitted pro hac vice*

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 27, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system to send notification of such filing to all counsel of record.

/s/ Garrett W. Wotkyns  
Garrett W. Wotkyns, *admitted pro hac vice*

*Counsel for Plaintiffs*